

MILDRED MARIE WELTY	*	NO. 24,186 EQUITY
	*	
VS.	*	IN THE
	*	
CLARENCE A. WELTY	*	CIRCUIT COURT
* * * * *	*	
CLARENCE A. WELTY	*	FOR
Cross-Complainant	*	
	*	FREDERICK COUNTY,
Vs.	*	
MILDRED MARIE WELTY	*	MARYLAND
Cross-Defendant	*	
* * * * *		

CROSS-BILL OF COMPLAINT

TO THE HONORABLE, THE JUDGES OF SAID COURT:

The Cross-Bill of Complaint of Clarence A. Welty, Sr., by Edwin F. Nikirk II, his Solicitor, respectfully represents unto your Honorable Court:

FIRST: That on the 5th day of May, 1972, the Cross-Complainant, Clarence A. Welty, Sr., executed a Deed to certain real property located on the west side of Motter Avenue, in Frederick City, Frederick County, State of Maryland, unto one Charles R. Smith, the said Charles R. Smith to act as a straw party to re-convey said property unto Clarence A. Welty, Sr. and Mildred Marie Welty, his wife.

SECOND: That on the same date, May 5, 1972, the said Charles R. Smith, did grant and convey unto Clarence A. Welty, Sr. and Mildred M. Welty, his wife, as tenants by the entireties, in fee simple, the same parcel of land, with improvements.

THIRD: That it was never the intention of your Cross-Complainant to deliver and record the Deed from the Cross-Complainant to Charles R. Smith, and that the said deed was kept by an agent of Clarence A. Welty, Sr. so that it could not be recorded.

FOURTH: That the said Deed from Charles R. Smith to Clarence A. Welty, Sr. and Mildred M. Welty, his wife, was kept

FILED

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ELLIS C. WACHTER, CLERK

BY: Watkins